#### SUPPORTING STATEMENT FOR VA FORM 26-4555, APPLICATION IN ACQUIRING SPECIALLY ADAPTED HOUSING OR SPECIAL HOME ADAPTATION GRANT (2900-0132)

### A. Justification

### **1.** Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

VA grants for Specially Adapted Housing (SAH) and Special Housing Adaptations (SHA) for disabled Veterans or Servicemembers are authorized under Title 38, U.S.C., chapter 21. The term Veteran is used throughout this document and refers to both Veterans and Servicemembers.

### 2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

VA Form 26-4555 is used to gather the necessary information to determine Veteran eligibility for the SAH or SHA grant. The Veteran will complete VA Form 26-4555 and submit it to the nearest VA Regional Loan Center (RLC), or Veterans Service Center (VSC). If the RLC receives the application, the application is input into the RLC system of record establishing a trackable file, and then the application is provided to the VSC. VSC will establish a claim for disability rating, rate the claim, and then update the Veteran's rating record and notify the RLC system of record. The RLC will update the file and send the appropriate form letter to the Veteran notifying him or her of basic eligibility for the SAH or SHA benefit. The initial interview with the Veteran will be held within 30-business days for purposes of providing grant and related information.

# 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Veterans have the option to submit VA Form 26-4555 electronically through the eBenefits website at https://www.ebenefits.va.gov/. However, the electronic format requires additional information to be obtained from the Veteran. This information is required when the Veteran has no prior VA benefit claim established and is collected on behalf of Compensation and Pension (C&P) to facilitate processing a claim for SAH benefits. Since C&P may request additional information from the Veteran as needed during examination of the Veteran record, that same information is not collected on VA Form 26-4555. VA Form 26-4555 is also available through the One VA forms website at http://www.va.gov/vaforms in a fillable electronic format.

## 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

No duplication of information is involved. The electronic form solicits personal information from the Veteran that would not be available in another agency's records. To the extent VA

already has access to certain specific information pertaining to an individual applicant, eBenefits will pre-populate those specific items and it will not be necessary for an applicant to re-submit such information. However, if the information on record with VA or the Department of Defense (DoD) is incorrect or incomplete, individual applicants will need to provide certain specific information necessary to determine eligibility for SAH benefits.

### 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Small business organizations are not involved.

## 6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Frequency is generally one-time per applicant. This information will be collected on an "as needed" basis. To the extent VA already has access to certain specific information pertaining to an individual applicant eBenefits will pre-populate those specific items and it will not be necessary for an applicant to re-submit such information. However, if the information on record with VA or DoD is incorrect or incomplete individual applicants will need to provide certain specific information necessary to determine eligibility for SAH benefits.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

# 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The Department 60-day notice was published in the Federal Register on March 22, 2018, Volume 83, No, 118, pages 12654-12655. The Department 30-day notice was published in the Federal Register on June 19, 2018, Volume 83, No, 118, pages 28492-28493. No comments were received in response to these notices.

## 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts to respondents have been made under this collection of information.

## 10. Describe any assurance of privacy to the extent permitted by law provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Loan Guaranty Home, Condominium and Manufactured Home Loan Applicant Records, Specially Adapted Housing Applicant Records, and Vendee Loan Applicant Records - VA (55VA26) contained in the Privacy Act Issuances, 2018 Compilation, as posted in the Federal Register on August 13, 2018, Volume 83, Number 156, pages 40140 - 40147.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

### 12. Estimate of the hour burden of the collection of information:

- a. Number of yearly respondents totals = 7,000.
- b. Frequency of Response is one time.
- c. Annual burden total = 1,167 hours.
- d. The estimated completion time is 10 minutes.
- e. The respondent population for VA Form 26-4555 are Veterans with service connected disabilities. VBA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean hourly wage is \$24.34 based on the BLS wage code – "00-0000 All Occupations". This information is taken from the following website: (https://www.bls.gov/oes/2017/may/oes\_nat.htm).

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$28,404.78 (1,167 burden hours x \$24.34 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

This submission does not involve any recordkeeping costs.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Estimated Costs to the Federal Government:

Grad		Burden	Hourly	Cost Per	Total	
e	Step	Time	Rate	Response	Responses	Total
			\$			
11	5	10min	28.82	\$ 4.80	7,000	\$33,600.00
Processing / Analyzing Costs					\$0	
Printing and Production Cost						\$0
Total Cost to Government						\$33,600.00

Note: the hourly wage information above is based on the hourly 2018 General Schedule (Base) Pay (<u>https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/</u>2018/GS h.pdf). This rate does not include any locality adjustment, as applicable.

### 15. Explain the reason for any burden hour changes since the last submission.

The increase in burden hours is due to the rise in the number of respondents for SAH or SHA grants from 6,000 to 7,000 annually due to improved outreach campaigns.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information collection is not for publication or tabulation use.

### 17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking approval to omit the expiration date for OMB approval.

## 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

This submission does not contain any exceptions to the certification statement.

### B. Collection of Information Employing Statistical Methods

The data collection does not employ statistical methods.